

**U.S. Geological Survey
New England Water Science Center
NH/VT Water Office
331 Commerce Way, Suite 2
Pembroke, NH 03275**

May 5, 2015

Mr. Stephen Tzhone
U.S. Environmental Protection Agency, Region 6
Superfund AR/LA Enforcement Section (6SF-RA)
1445 Ross Avenue
Suite 1200
Mail Code: 6SF
Dallas, TX 75202

RE: Submission of review comments on the Supplemental Groundwater Tracing Report, Arkwood Site, March 2015

Dear Mr. Tzhone:

We are pleased to submit this review of the summary document describing results from the November 2014 tracer study at the Arkwood Site. In general, site and test conditions were inadequately described and additional information is needed to properly assess the merits of the test. However, some concerns regarding the tests are apparent and highlighted in the attached review document. A primary concern is whether the extraction from the deep well at the site coupled with injection and potential mounding from the two shallow wells induced downward flow. Downward flow could underflow past adjacent sampling locations like New Cricket Spring. Water-level data on pre, during, and post injection would help identify the degree of mounding and whether the method of tracer introduction is problematic. For example, if water levels showed only minor changes from either extraction or injection, then the likelihood that the test may have induced underflow is less likely.

Please call if you have any questions (803-650-7113 (SC); 603-226-7894(NH)).

Sincerely,

Signed....

Philip T. Harte

Research Hydrologist, P.G.

cc. Kent Becher

Attachment: Review Document